

CUMMINGS & LOCKWOOD LLC

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 11/7/04

November 5, 2004

Via Facsimile

Honorable Frank Maas  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 740  
New York, New York 10007-1312

Re: American Steamship Owners Mutual Protection and  
Indemnity Association, Inc. v. Alcoa Steamship Co., Inc., et al.  
- 04 Civ. 04309 (LAK)

Dear Honorable Maas:

Our firm represents Defendant ChevronTexaco Corporation ("ChevronTexaco") in the above-captioned matter. ChevronTexaco was recently served with Plaintiff's Second Amended Complaint on October 20, 2004. A responsive pleading is due on November 9, 2004. In order to thoroughly investigate Plaintiff's claims, we write to request a thirty (30) day extension of time, up to and including Thursday, December 9, 2004, to file a responsive pleading. This is the Defendant's first request for an extension of time. Counsel for the Plaintiff has consented to this request. Please feel free to contact me at the number above if you should have any questions. Thank you in advance for the consideration given to this request.

Respectfully submitted,

John W. Cannavino (JWC - 7076)

JWC/kb

John W. Cannavino

Principal

203.351.4447 Direct

203.708.3849 Fax

jcanavino@cl-law.com

www.cl-law.com

Street Address:

Four Stamford Plaza

107 Elm Street

Stamford, CT 06902

Post Office Address:

P.O. Box 120

Stamford, CT 06904-0120

203.327.1700 Phone

203.351.4535 Fax

MEMO ENDORSED

U.S. DISTRICT COURT  
FILED NOV - 9 2004

S. D. OF N.Y.

11/15/04

ORDERED  
John W. Maas

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

11/15/04

Honorable Frank Maas

-2-

November 5, 2004

cc: Steven I. Frenkel, Esq. (firm)  
Lawrence J. Bowles, Esq. (via fax)  
Patrick F. Lennon, Esq. (via fax)  
Gene B. George, Esq. (via fax)  
Julia R. Brouhard, Esq. (via fax)  
Dale A. Schreiber, Esq. (via fax)  
Edward A. Keane, Esq. (via fax)  
Mario Aieta, Esq. (via fax)  
Deborah A. Silodor, Esq. (via fax)  
Charles Addison Stewart, III, Esq. (via fax)  
Stacey Ann Saiontz, Esq. (via fax)  
Mindy Davis, Esq. (via fax)  
Christine S. Davis, Esq. (via fax)  
Lisa M. Campisi, Esq. (via fax)  
Andrew S. Dash, Esq. (via fax)  
Peter Adelman, Esq. (via fax)  
Edward V. Cattell, Jr., Esq. (via fax)  
Herbert I. Waldman, Esq. (via fax)  
Raymond Aloysius Connell, Esq. (via fax)  
Brent A. Hannafan, Esq. (via fax)  
Robert A. Cohen, Esq. (via fax)  
Rodney M. Zerbe, Esq. (via fax)  
Scott B. Fisher, Esq. (via fax)  
Alan Kellman, Esq. (via fax)  
Dan Shaked, Esq. (via fax)  
John M. Toriello, Esq. (via fax)  
Robert O'Hare, Jr., Esq. (via fax)

**CUMMINGS & LOCKWOOD LLC**

Street Address:  
Four Stamford Plaza  
107 Elm Street  
Stamford, CT 06902

Post Office Address:  
P.O. Box 120  
Stamford, CT 06904-0120

**TRANSMIT THE ATTACHED TO:**

**DATE:**

November 5, 2004

Name: Honorable Frank Maas

Name:

Company: Daniel Patrick Moynihan U.S. Courthouse

Company:

FAX: 212.805.6724

FAX:

Confirming No.:

Confirming No.:

Name:

Name:

Company:

Company:

FAX:

FAX:

Confirming No.:

Confirming No.:

**FAX COVER SHEET INFORMATION:**

From:	John W. Cannavino	Client No.:	802000.2457
Phone:	203.351.4447	Infortext:	1216
Email:	jcannavino@cl-law.com	Pages including cover sheet:	3
Fax:	203.708.3849	Confirming No.:	

**COMMENTS:**

Dear Honorable Maas-

Please see the attached regarding American Steamship Owners Mutual Protection and Indemnity Association, Inc. v. Alcoa Steamship Co., Inc. 04-cv-04309 (LAK).

Respectfully Submitted,

John Cannavino (JWC - 7076)